

# UNITED STATES DISTRICT COURT

for the  
District of Nevada

United States of America

v.

YUE YUAN

*Defendant*

Arizona Case No: 25-01552MJ

Case No. 2:25-cr-0098-JCM-BNW

## ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) YUE YUAN

who is accused of an offense or violation based on the following document filed with the court:

- ☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint  
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

18 U.S.C. §§ 1349 and 1344(2) ~ Conspiracy to Commit Bank Fraud

18 U.S.C. § 1028A, 2 ~ Aggravated Identity Theft

DEBRA K. KEMPI

CLERK

*Debra K. Kemp*

(By) DEPUTY CLERK



4/16/2025 Las Vegas, NV

DATE

### Return

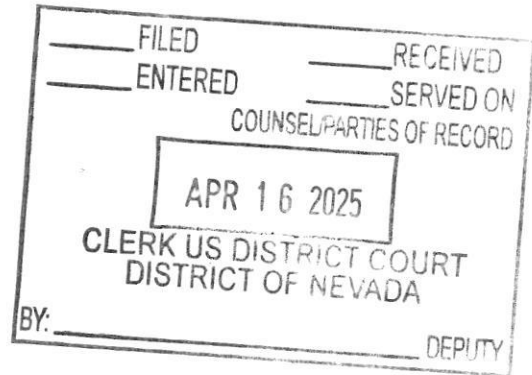
This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
at (city and state) \_\_\_\_\_.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Arresting officer's signature*

\_\_\_\_\_  
*Printed name and title*

SIGAL CHATTAH  
United States Attorney  
District of Nevada  
Nevada Bar No. 8264  
KIMBERLY M. FRAYN  
Assistant United States Attorney  
501 Las Vegas Boulevard South, Suite 1100  
Las Vegas, Nevada 89101  
Tel: (702) 388-6336  
Kimberly.Frayn@usdoj.gov



MARGARET A. MOESER  
Chief, Money Laundering and Asset Recovery Section  
U.S. Department of Justice/Criminal Division  
Kenneth P. Kaplan  
Trial Attorney  
D.C. Bar No. 460614  
The Bond Building  
1400 New York Avenue, NW, Suite 1000  
Washington, DC 20005  
(202) 514-2000  
kenneth.kaplan@usdoj.gov

*Attorneys for the United States*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JIN WEI CHEN,

XIE JIE CHEN,  
aka "Johnny Chen," and

YUE YUAN,

Defendants.

**SEALED  
CRIMINAL INDICTMENT**

Case No.: 2:25-cr-0098-JFM-BNW

**VIOLATIONS:**

**18 U.S.C. §§ 1349 and 1344(2) – Conspiracy to  
Commit Bank Fraud; and**

**18 U.S.C. § 1028A, 2– Aggravated Identity  
Theft.**

**FORFEITURE ALLEGATION**

**THE GRAND JURY CHARGES THAT:**

**COUNT ONE**  
**Conspiracy to Commit Bank Fraud**  
**(18 U.S.C. §§ 1349, 1344(2))**

**Individuals and Entities**

At all times material to the Indictment, unless otherwise stated:

1. Defendant JIN WEI CHEN ("JW. CHEN") was a citizen of the Republic of China and was believed to reside in, among other places, New York, Oklahoma, and Maryland.
2. Defendant XIE JIE CHEN, also known as Johnny Chen ("J. CHEN"), was a citizen of the United States and was believed to reside in Pennsylvania, Florida, and California.
3. Defendant YUE YUAN ("YUAN") was a citizen of the Republic of China and was believed to reside in, among other places, New York and Oklahoma.
4. Individual 1 resided in Oklahoma.
5. Individual 2 resided in New York.
6. Individual 3 resided in New York.
7. Victims include, but are not limited to, the following individuals:

Victim	State of Residence
1 – G.C.	Texas
2 – W.N.N.	Texas
3 – X.Q.	Texas
4 – C.C.N.	Texas
5- Z.W.W.	Texas
6 – S.Q.N.	Texas
7 – J.C.	Texas
8 – L.W.	Texas
9 – C.C.	Texas
10 – Z.Z.	Texas
11 – J.B.L.	Texas
12 – B.K.	Texas
13 – C.W.	Texas
14 – K.G.	New York





**The Object of the Conspiracy**

15. It was the object of the conspiracy that JW. CHEN, J. CHEN, YUAN, and others known and unknown to the Grand Jury (collectively the “co-conspirators”), devised, executed, and attempted to execute a scheme to defraud and to obtain moneys, funds, credits, assets, securities, and other property owned by victims, and under the custody and control of Financial Institutions 1 and 2 by means of materially false and fraudulent pretenses, representations, and promises to enrich themselves and their known and unknown coconspirators.

**Manner and Means**

16. The object of the conspiracy was to be accomplished by the following ways, manner, and means, among others:

a. As part of the scheme, JW. CHEN, YUAN, and others unknown used personally identifiable information (“PII”) to fraudulently obtain more than 5,000 genuine drivers’ licenses from TDPS and NYDMV in the identities of the victims, including Victims 1 to 14.

b. It was further part of the scheme that JW. CHEN, J. CHEN, YUAN and others known and unknown, used the PII and drivers’ licenses obtained by fraud to learn financial information about some of the victims, such as identifying bank accounts, credit card accounts, and lines of credit belonging to those victims.

c. It was further part of the scheme that JW. CHEN, J. CHEN, and others known and unknown, used the PII and drivers’ licenses obtained by fraud to learn personal information about some of the victims, such as identifying the victims’ employment histories and identifying phone numbers, email addresses, and residential addresses belonging to the victims.

1 d. It was further part of the scheme that JW. CHEN and others known and  
2 unknown provided the fraudulently-obtained drivers' licenses and other PII to J. CHEN,  
3 Individual 1, Individual 2, Individual 3, and other known and unknown coconspirators.

4 e. It was further part of the scheme that JW. CHEN, J. CHEN, YUAN,  
5 Individual 1, Individual 2, Individual 3, and others known and unknown, traveled to Las Vegas,  
6 Nevada, in the State and Federal District of Nevada, and other Districts throughout the country,  
7 to engage in conduct furthering the object of the conspiracy, by (i) impersonating the victims by  
8 falsely claiming to be the individuals identified in the drivers' licenses when in truth and fact they  
9 were not; (ii) obtaining and attempting to obtain funds from the victims' accounts at financial  
10 institutions, such as Financial Institutions 1 and 2; and (ii) purchasing and attempting to  
11 purchase vehicles in the names of the victims by obtaining financing in the names of the victims.

12 **Acts in Furtherance of the Conspiracy**

13 17. In or about August and September 2022, JW. CHEN, J. CHEN, YUAN, and  
14 others, known and unknown, fraudulently caused the mailing of thousands of genuine drivers'  
15 licenses to addresses in Oklahoma and New York.

16 18. In or about October 2022, JW. CHEN directed Individual 1 to rent a vehicle in  
17 Las Vegas, Nevada, for purposes of traveling to the District of Arizona and, while in Arizona,  
18 transporting Individual 2 and Individual 3, among other coconspirators, for the purpose of  
19 engaging in criminal conduct to further the object of the conspiracy including but not limited to  
20 Bank Fraud.

21 19. In or about October 2022, JW. CHEN, J. CHEN, YUAN, and others known and  
22 unknown arranged for known and unknown coconspirators, including Individual 1, Individual  
23 2, and Individual 3 to reside in hotels and short-term rental housing in Las Vegas, Nevada, and  
24



1 in the District of Arizona and elsewhere, while they were engaged in conduct furthering the  
2 object of the conspiracy, including but not limited to Bank Fraud.

3 20. In or about January 2023, JW. CHEN provided drivers' licenses belonging to  
4 Victim 2 and Victim 3 to Individual 1, who used those drivers' licenses for the purposes of  
5 engaging in criminal acts to further the object of the conspiracy.

6 21. On or about January 19, 2023, in the District of Colorado, Individual 1, and  
7 others known and unknown, using a genuine, but fraudulently obtained TDPS driver's license  
8 belonging to Victim 2, posed as Victim 2 and purchased and financed a Porsche from Car  
9 Dealership 1 claiming to employee(s) of Car Dealership 1 that they were Victim 2 when in truth  
10 in fact they were not.

11 22. On or about January 27, 2023, in the District of Utah, Individual 1, using a  
12 genuine, but fraudulently obtained TDPS driver's license belonging to Victim 3, posed as Victim  
13 3 and purchased and financed a Mercedes Benz from Car Dealership 2 claiming to employee(s)  
14 of Car Dealership 2 that they were Victim 3 when in truth and fact they were not.

15 23. On or about January 31, 2023, Individual 1 and two other co-conspirators used  
16 the above Porsche to drive to a Financial Institution 1 branch in the District of Utah for the  
17 purpose of impersonating a victim using a driver's license provided to them by JW. CHEN.  
18 They unsuccessfully attempted to access the victim's account by withdrawing \$2,000.

19 24. On or about February 6, 2023, a co-conspirator used the above Mercedes Benz to  
20 drive to a Financial Institution 1 branch in the District of Minnesota for the purpose of  
21 impersonating Victim 5 using a driver's license. That co-conspirator unsuccessfully attempted to  
22 access the victim's account by withdrawing \$2,000.

23 25. On or about the dates below, the co-conspirators took over Financial Institution 1  
24 accounts belonging to the victims below and successfully withdrew the approximate amounts

below at Financial Institution 1 branches located in the state below by impersonating the victims below using drivers' licenses belonging to the victims below:

Date	State	Victim	Amount Withdrawn
9/26/2022	Nevada	1	\$20,000
9/27/2022	Nevada	1	\$2,000
9/28/2022	Nevada	7	\$2,000
10/20/2022	Nevada	8	\$2,000
10/22/2022	Nevada	9	\$2,000
10/24/2022	Nevada	9	\$2,000
10/26/2022	Nevada	10	\$2,000
10/26/2022	Nevada	10	\$2,000
10/27/2022	Nevada	10	\$2,000
11/9/2022	Arizona	12	\$96,921
11/9/2022	Arizona	13	\$94,000
12/7/2022	Nevada	11	\$39,752
1/31/2023	Utah	4	\$2,000
2/06/2023	Minnesota	5	\$2,000
2/15/2023	Indiana	6	\$2,000

26. On or about November 22, 2022, JW. CHEN and J. CHEN, while in the State and Federal District of Nevada, possessed at least nine Texas driver's licenses belonging to victims and a New York driver's license belonging to Victim 14. That same day, J. CHEN impersonated Victim 14 and unsuccessfully attempted to withdraw \$550,000 dollars from a Home Equity Line of Credit in Victim 14's name at Financial Institution 2 while JW. CHEN waited outside the bank branch in a car rented by J. CHEN.

27. On or about March 12, 2023, in the Middle District of Tennessee, J. CHEN and other known and unknown coconspirators possessed approximately 600 driver's licenses belonging to victims, including Victim 2, Victim 9, and Victim 11.

**COUNTS TWO TO FOUR**  
**Aggravated Identity Theft**  
**(18 U.S.C. §§ 1028A, 2)**

28. Paragraphs One through Twenty-Seven of this Indictment are hereby realleged and incorporated herein by reference.



29. On or about the dates below, in the State and Federal District of Nevada and elsewhere,

**JIN WEI CHEN,  
XIE JIE CHEN, aka "Johnny Chen," and  
YUE YUAN,**

defendants herein, aiding and abetting one another and others known and unknown, knowingly transferred, possessed, and used, without lawful authority, the means of identification of another person below, during and in relation to a felony violation, that is, Conspiracy to Commit Bank Fraud, a violation of Title 18, United States Code, Sections 1349 and 1344(2), as alleged in Count One, each means of identification a separate violation of Title 18, United States Code, Sections 1028A and 2:

COUNT	DATE	DEFENDANTS	MEANS OF IDENTIFICATION
TWO	10/24/2022	JW. CHEN J. CHEN YUAN	Driver's license belonging to Victim 9
THREE	11/22/2022	JW. CHEN J. CHEN	Driver's license belonging to Victim 14
FOUR	12/7/2022	JW. CHEN J. CHEN YUAN	Driver's license belonging to Victim 11

#### FORFEITURE ALLEGATION

30. The allegations contained in Count One of the Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture under 18 U.S.C. §§ 982(a)(2)(A), (b)(1).

31. Upon conviction of any type of the felony offense charged in Count One of this Indictment,

**JIN WEI CHEN,  
XIE JIE CHEN, aka "Johnny Chen," and  
YUE YUAN,**

1 defendants herein, shall forfeit to the United States of America, any property constituting, or  
2 derived from, proceeds the person obtained directly or indirectly as the result of such violation.

3 32. **Money Judgment**

4 Defendants are also notified that upon conviction, the United States may seek a money  
5 judgment in the amount equal to the total value of the property subject to forfeiture.

6 33. **Substitute Assets**

7 If any of the property described above, as a result of any act or omission of the  
8 defendants,

- 9 a. Cannot be located upon the exercise of due diligence;  
10 b. Has been transferred or sold to, or deposited with a third party;  
11 c. Has been placed beyond the jurisdiction of the Court;  
12 d. Has been substantially diminished in value; or

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1 e. Has been commingled with other property that cannot be divided without  
2 difficulty, the United States of America shall be entitled to forfeitures of substitute property  
3 pursuant to Title 21, United States Code, Section 853(p) as incorporated by Title 18, United  
4 States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

5 **DATED:** this 16<sup>th</sup> day of April, 2025.

6 **A TRUE BILL:**


7  
8 /S/  
FOREPERSON OF THE GRAND JURY

9  
10 SIGAL CHATTAH  
UNITED STATES ATTORNEY

11   
12 KIMBERLY M. FRAYN  
Assistant United States Attorney

4/16/2025  
Date

13 MARGARET A. MOESER  
14 Chief, Money Laundering and Asset Recovery Section  
15 U.S. Department of Justice/Criminal Division

16   
17 KENNETH P. KAPLAN  
Trial Attorney  
18 United States department of Justice/Criminal Division

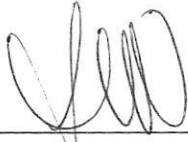
4/16/2025  
Date



e. Has been commingled with other property that cannot be divided without difficulty, the United States of America shall be entitled to forfeitures of substitute property pursuant to Title 21, United States Code, Section 853(p) as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

**DATED:** this 16<sup>th</sup> day of April, 2025.

**A TRUE BILL:**


  
Deputy Foreperson  
FOREPERSON OF THE GRAND JURY

SIGAL CHATTAH  
UNITED STATES ATTORNEY

  
KIMBERLY M. FRAYN  
Assistant United States Attorney

4-16-2025  
Date

MARGARET A. MOESER  
Chief, Money Laundering and Asset Recovery Section  
U.S. Department of Justice/Criminal Division

  
KENNETH P. KAPLAN  
Trial Attorney  
United States department of Justice/Criminal Division

4-16-2025  
Date